

EXHIBIT A

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

DONNA CURLING, *et al.*

Plaintiffs,

v.

BRAD RAFFENSPERGER, *et al.*,

Defendants.

CIVIL ACTION

FILE NO. 1:17-cv-2989-AT

DECLARATION OF GABRIEL STERLING

Pursuant to 28 U.S.C. § 1746, I, GABRIEL STERLING, make the following declaration:

1.

My name is Gabriel Sterling. I am over the age of 21 years, and I am under no legal disability which would prevent me from giving this declaration. If called to testify, I would testify under oath to these facts.

2.

I currently am the Implementation Manager for the Statewide Voting System for the Secretary of State's Office. I have held that position since October 2019. Since taking this position, I have acquired firsthand knowledge of Georgia's upgrade to the new voting system and the rollout of the new Dominion system.

3.

As of January 15, 2020, Georgia has accepted (meaning that the devices have passed acceptance testing) 29,197 BMDs.

4.

At the time of giving this declaration, BMDs have either been delivered or are scheduled for delivery in 94 counties, which includes the counties with the greatest number of registered voters in the state and representing 85% of the total BMD deployment. Since October 2019, every county also has at least two BMDs for demonstrations and training purposes—one of which is for ADA use.

5.

The rollout has experienced delays in scheduling the pickup of the old GEMS/DRE system from the counties due to storage-related issues outside of our control, but the Election Management System will be deployed in all 159 counties no later than February 1, 2020 and the BMD rollout is on pace to be completed by mid-February.

6.

Aside from delays related to storage of the equipment, the preparation of warehouses and other logistics for delivery of the BMDs can also affect when a county will be ready for delivery. However, weekly deliveries have increased each

week—deliveries to 16 counties were scheduled for this week and deliveries are continuing to be scheduled. Moreover, we have received commitments that all of the machines will be physically in the state of Georgia by January 28, 2020.

7.

Dominion optical scanners will be used to count all ballots in Georgia elections beginning with the March 2020 Presidential Preference Primary. With the Dominion EMS and Dominion scanners, every county can conduct elections on the Dominion System, even if a county has not received its full state allotment of BMDs.

8.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 16th day of January, 2020.


GABRIEL STERLING